

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NICOLE WADE, JONATHAN GRUNBERG,
and G. TAYLOR WILSON

Plaintiffs,

v.

L. LIN WOOD,

Defendant.

CIVIL ACTION

FILE NO. 1:22-CV-01073

SUPPLEMENTAL AFFIDAVIT OF L. LIN WOOD, JR.

I, L. Lin Wood, being duly sworn, depose and state as follows:

1. My name is L. Lin Wood. I am over 18 years of age and of sound mind, and I am capable of making this affidavit. I submit this affidavit in support of the Defendant's Motion for a Supersedeas Bond and Motion to Stay Execution of Judgment Pending Appeal.

2. I am a retired attorney in the State of Georgia where I practiced law for 45 years.

3. Since Oct. 15, 2014 I have owned the parcel of property at 663 Greenview, Atlanta, GA 30305 (hereinafter the "Atlanta House") in my name.

4. I purchased the Atlanta House for \$675,000. *See* Ex. 2, 4 (listing "\$675,000" as the "Actual Value of consideration received by seller").

5. Over the years I invested at least \$500,000 in improvements, which include renovations of the interior and a two-car garage.

6. The Fulton County Tax Commissioner lists the Fair Market Value of my Atlanta House to be \$1,121,000. A true and correct copy of that listing is attached hereto as Exhibit 1.

This amount is consisted with what I had previously cited in my initial affidavit:

Redfin Realty estimates that my house would sell for an amount between \$1.14 and \$1.36M. See <https://www.redfin.com/GA/Atlanta/663-Greenville-Ave-NE-30305/home/24831280> (last visited on Sep. 8, 2024). Zillow estimates that the Atlanta House would sell for \$1,150,700. https://www.zillow.com/homes/663-Greenville-Ave-NE-Atlanta,-GA-30305_rb/35928727_zpid/ (last visited on Sep. 11, 2024).

Doc. 155-3, ¶ 6; *see also*, screenshots of the above links in Exhibit 4.

7. A house across the street from the Atlanta House sold for \$1,385,000 on Sep. 3, 2024. *See* Warranty Deed of Sale of Sep. 3, 2024 Sale of 672 Greenville, Atlanta, GA 30305 (a true and correct copy is attached hereto within Exhibit 2). The previously mentioned Redfin website was accurate with respect to its listing of the 672 Greenville house's sale. *Compare* Ex. 2 with <https://www.redfin.com/GA/Atlanta/672-Greenville-Ave-NE-30305/home/24789247> (last visited on Oct. 4, 2024).

8. I am the sole owner of the shares of Tomotley Crew, LLC.

9. The Atlanta House is unencumbered and is not subject to any mortgage. *See* Ex. 2 (showing only a canceled security deed and a limited warranty deed after searching the property within the Georgia Superior Court Clerk's Cooperative Authority, the only online tool available from within the Fulton County Clerk's Office Records Search Center).

10. My now 191 acres of Cotton Hall are subject to a conservation easement, but is otherwise unencumbered. Based off information and belief, the conservation easement would not affect the sale of Cotton Hall. Because I do not believe the conservation easement to be a diminution in value of property, I did not think to include conservation easement as an encumbrance in my initial affidavit.

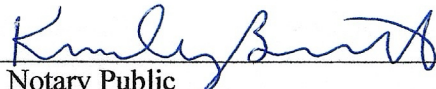
11. I made an effort to obtain a supersedeas bond. I cannot obtain a surety bond because I do not have the liquidity necessary for the issuance of a bond for the full amount of \$4.7 million requested by Plaintiffs. I have neither sufficient cash, nor any securities such as stock market investments that I could easily convert to cash. In lieu of a supersedeas bond, I pledge Cotton Hall Plantation and the Atlanta House as security. If necessary to supplement that security, I will also pledge a partial supersedeas bond of \$2 million, which is 80% of the \$2.48 million net proceeds (after payment of an outstanding mortgage and real estate closing expenses) of my recent sale of Huspah Plantation. The remaining \$500,000 will be necessary for capital gains income tax purposes. I have the full \$2.48 million set aside in a separate bank account.

FURTHER AFFIANT SAYETH NOT.



L. Lin Wood, Jr.

Sworn to and subscribed before me this
4 day of October, 2024.



Notary Public

My commission expires:

03/04/2025

